

May 15, 2018

U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue, Suite 955
Seattle, WA 98101-3140

Attn: Lisa McArthur

Transmitted via email to: *McArthur.Lisa@epa.gov*

**Re: Notice of Change to Supplemental PCB Self-Implementing Notice
PCC Structurals, Inc. – Large Parts Campus
Portland, Oregon
Project No. 0883002.040.046**

Dear Ms. McArthur:

This letter serves as notice to the U.S. Environmental Protection Agency (EPA) Region 10 that PCC Structurals, Inc. (PCC) has made a change to the Supplemental PCB Self-Implementing Notice (Notice), submitted to the EPA on July 25, 2016 (LAI 2016). The Notice concerns Area B East of the PCC Large Parts Campus in Portland, Oregon, and was prepared in accordance with the Toxic Substances Control Act (TSCA), which requires that a self-implementing procedure be developed for the cleanup and disposal of polychlorinated biphenyl (PCB) remediation waste (40 Code of Federal Regulations [CFR] § 761.61 [a]).

On August 19 and 20, 2015, initial soil characterization activities were conducted in Area B East in keeping with the Self-Implementing Plan (LAI 2015). With a maximum total PCB sample result of 8,610 micrograms per kilogram ($\mu\text{g}/\text{kg}$), Area B East met the requirements for self-implementing cleanup standards for low-occupancy areas set forth in 40 CFR 761.61. At that time, no further action was planned for Area B East, though a deed restriction was to be filed, per TSCA cleanup requirements for self-implementing procedures.

Following submittal of the Notice, PCC developed plans to excavate portions of the Area B East hillside, adjacent to existing chiller towers, to accommodate construction of the new chiller tower foundation. A soil sampling work plan was submitted to the Oregon Department of Environmental Quality (ODEQ) and EPA on January 26, 2018 (LAI 2018a). The work plan included a figure that showed the proposed chiller tower improvements as well as the anticipated depths and locations of exploratory borings. Results of the February 2018 soil sampling were included in a draft Phase II Remedial Investigation Soil Sampling Report (LAI 2018b). Soil analysis identified a maximum total PCB sample result of 29.6 $\mu\text{g}/\text{kg}$; as such, Area B East continues to satisfy the self-implementing cleanup standards for low-occupancy areas, based on 40 CFR 761.61.

As part of the proposed chiller tower construction, PCC plans to excavate Area B East to the existing grade at the toe of the slope. Soils in Area B East are known to contain concentrations of PCB less than 50 milligrams per kilogram, and will be managed in a Subtitle D landfill. Final soil volumes will be documented in a report to ODEQ and EPA. In the event that the entirety of Area B East is not excavated, a deed restriction will be filed for the remaining area.

LANDAU ASSOCIATES, INC.



Della Fawcett, RG
Senior Project Geologist



Jay Bower, PE
Chief Executive Officer

DMF/JPB/mcs

[\\EDMDATA01\PROJECTS\883\002\FILERM\R\040\UPLAND PCB\S\2018-04-20 - AREA B EAST COOLING TOWER SAMPLING\EPA LETTER\NOTICE OF CHANGE TO SUPPLEMENTAL PCB SELF-IMPLEMENTING NOTICE FOR PCC LPC_PC REDLINES.DOCX]

cc: Chris Myers, PCC Structurals, Inc.
Bryan McCampbell, PCC Structurals, Inc.
Peter Serrurier, Precision Castparts Corp.
Paul Seidel, Oregon Department of Environmental Quality
Dana Bayuk, Oregon Department of Environmental Quality
Dave Bartus, U.S. Environmental Protection Agency

References

- LAI. 2018a. Chiller Tower Project Soil Sampling Work Plan, PCC Structurals, Inc. Large Parts Campus, Portland, Oregon. Landau Associates, Inc. January 26.
- LAI. 2018b. Draft Phase II Remedial Investigation Chiller Tower Soil Sampling Report, PCC Structurals, Inc. Large Parts Campus, Portland, Oregon. Landau Associates, Inc. May 8.
- LAI. 2015. Letter: Notice and Certification of Self-Implementing Cleanup, PCC Structurals, Inc. Large Parts Campus, 4600 SE Harney Drive, Portland, Oregon. Landau Associates, Inc. July 1.
- LAI. 2016. Supplemental PCB Self-Implementing Notice to EPA, PCC Structurals, Inc. Large Parts Campus, Portland, Oregon. Landau Associates, Inc. July 25.